

March 5, 2020

VIA CM/ECF & E-MAIL

The Hon. Shelley C. Chapman
United States Bankruptcy Court
Southern District of New York
One Bowling Green
New York, NY 10004
scc.chambers@nysb.uscourts.gov

Re: DaDong Catering LLC (19-13629-scc)

Dear Judge Chapman:

As you know, my firm is counsel to *Karen's Crystal Land, Inc.*, the purchaser of substantially all of the above-referenced debtor's property pursuant to your sale order dated February 7, 2020 [Doc. No. 90].

Pursuant to the sale order, the landlord agreed, for a fee, to permit our client to occupy the debtor's former premises through February 28, 2020 for the limited purpose of removing most of the property purchased pursuant to the sale order. We note that it was impossible to remove certain additional property by that deadline because to do so requires the issuance of a demolition permit by the City of New York. We have contemplated requesting additional time from the landlord to remove such property.

As to the property that was to be removed by February 28th, such deadline became impossible to meet because the freight elevator in the building became inoperable and unavailable for our client's use. We understand that the elevator is in the process of being repaired. Consequently, we asked the landlord for an extension of time to remove the property for a number of days equal to the number of days that the elevator was inoperable. Unfortunately, the landlord has refused our request, apparently relying on the deadline contained in the sale order.

We write to respectfully request that the Court convene a telephonic conference with our firm, counsel for the landlord, and counsel for the debtor, both of whom are copied on this letter, in an effort to resolve this dispute.

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We look forward to hearing from your Chambers regarding this request.

Respectfully yours,

/s/ Sanford P. Rosen
Sanford P. Rosen

SPR/clm

cc: Steven R. Wirth, Esq. (via e-mail)
George R. Hirsch, Esq. (via e-mail)